

2. That Isaac Thomas died intestate and was survived by Henrietta Thomas, his wife.

3. That Henrietta Thomas died testate in 1916, and pursuant to the terms of her Last Will and Testament, the real estate owned by the testatrix was to be kept "as a home for my children so long as any of them live". A copy of said Will is attached hereto and made a part hereof as Exhibit "B".

4. That Henrietta Thomas was survived by three (3) children, namely, Georgia Williams, Jane Thomas and Sara Brown.

5. That upon information and belief, the aforesaid Jane Thomas died intestate, without issue, in 1918.

6. That upon information and belief, the said Sara Brown died intestate in 1921, survived by one (1) son, Paige Brown.

7. That upon information and belief, said Paige Brown died intestate, without issue, in Philadelphia, Pennsylvania in 1958.

8. That Georgia Williams married Horace A. Williams, the executor of the estate of Henrietta Thomas, and three (3) children resulted from said union, namely, Complainant, Horace R. Williams, Sara Craig and Mary J. Pryor.

9. That Oliver Disney and his wife granted unto said Horace A. Williams and Georgia Williams, as tenants by the entireties, a parcel of land adjacent to the property at issue (adjacent tract) by deed dated March 3, 1923, recorded among the Land Records of Frederick County, Maryland, at Liber 342, folio 236. A copy of said deed is attached hereto as Exhibit "C" and made a part hereof.

10. That said Horace A. Williams died intestate in 1941 survived by his wife, Georgia Williams.

11. That said Georgia Williams granted unto your Complainants the adjacent tract by deed dated August 26, 1946, recorded among the Land Records of Frederick County, Maryland, at Liber 455, folio 550, upon which property your Complainants continue to reside. A copy of said deed is attached hereto as Exhibit "D" and made a part hereof.